

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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SECURITIES AND EXCHANGE COMMISSION,	:	
	:	
Plaintiff,	:	
	:	18 Civ. 8175 (ER)
– against –	:	
	:	ECF CASE
BARRY C. HONIG, ROBERT LADD,	:	
ELLIOT MAZA, BRIAN KELLER,	:	
JOHN H. FORD, GRQ CONSULTANTS, INC., and	:	
HS CONTRARIAN INVESTMENTS, LLC,	:	
	:	
Defendants.	:	
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**NOTICE OF PLAINTIFF’S MOTION TO STRIKE
DEFENDANT LADD’S AFFIRMATIVE DEFENSE OF ADVICE OF COUNSEL**

PLEASE TAKE NOTICE, that upon the Declaration of Nancy A. Brown, executed April 26, 2021, and the Exhibits thereto, and the Memorandum of Law in Support of the Motion, and the prior proceedings had herein, Plaintiff Securities and Exchange Commission (“Commission”), will move this Court, at a date and time to be determined by the Court, before the Honorable Edgardo Ramos, at the Thurgood Marshall United States Courthouse for the Southern District of New York, 40 Foley Square, New York, New York 10007, for an Order pursuant to Fed. R. Civ. P. 12(f), striking Defendant Ladd’s affirmative advice of counsel defense and all references to his reliance on counsel from his Answer; and

such other and further relief as the Court may deem just and proper.

Dated: New York, New York
April 27, 2021

Respectfully submitted,

SECURITIES AND EXCHANGE COMMISSION

By: s/ Nancy A. Brown
Nancy A. Brown
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